

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Student DOE #1, Student DOE #2, Student DOE
#3, Student DOE #4, Student DOE #5, and
Student DOE #6,
Plaintiffs,

v.

Kristi NOEM, in her official capacity as
Secretary of the United States Department of
Homeland Security, Todd LYONS, Acting
Director, U.S. Immigration and Customs
Enforcement, Ricky J. PATEL, in his official
capacity as Newark Special Agent in Charge,
Homeland Security Investigations, U.S.
Immigration and Customs Enforcement, and
John TSOUKARIS, in his official capacity as
Newark Field Office Director, Enforcement and
Removal Operation, U.S. Immigration and
Customs Enforcement,

Defendants.

Case No. 2:25-cv-2998-KSH-AME

[PROPOSED] ORDER

Upon consideration of Plaintiffs' request for expedited discovery, and for good cause
shown

IT IS on this ___ day of June, 2025, ORDERED as follows:

1. Plaintiffs shall serve Defendants with finalized expedited discovery requests within 7
days of the issuance of this Order.
2. Defendants shall comply with the requested discovery within 30 days of the date of
service of the expedited discovery requests. Any responses, answers, and objections to
Plaintiffs' discovery requests shall be served in accordance with Court Rules.

3. This expedited discovery shall not preclude the Parties from seeking additional discovery pursuant to Federal Rule of Civil Procedure 26.

Dated: _____

Honorable Katharine S. Hayden
United States District Judge